



March 24, 2014

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
RE: AT&T request of Waiver rule 22.913

Ms. Dortch,

Please consider this a modification to our comments filed on December 5, 2013 regarding the request filed by AT&T for a waiver of rule section 22.913 to permit use of PSD measurements in cellular bands in South Florida.

Background

Miami-Dade County provides public safety communications to more than 28,000 subscriber radio users serving over 2.5 million citizens in an area of more than 2,000 square miles. With the largest regional radio communications network in the State of Florida in terms of user density and traffic, it is essential that communications be provided to more than 100 local, state, and federal law enforcement and fire/rescue agency(s). In addition, the re-banding effort is ongoing as Miami-Dade is authorized to utilize the existing 800 MHz frequencies (821-824 MHz & 866-869 MHz) until July 21, 2014.

Objections Withdrawn Subject to Conditions

While we were initially hesitant to fully support the AT&T request for waiver, we are encouraged after having further discussion with AT&T regarding interference issues, that establishing a well-defined criteria of operational and technical conditions will mitigate future interference issues not only as with regards to AT&T but all other cellular carriers deploying communications technology to serve their respective subscriber base.



Our confidence is boosted by the fact that, AT&T has taken the initiative to work with Miami-Dade County and sought our input in preparing testing parameters in order to avoid interference issues when they deploy their LTE equipment in our area using the PSD measurement. Additionally, AT&T has advised us that they are only implementing LTE in the B Block at this time, and have agreed to limit their activity to the B Block spectrum. We also understand that AT&T's hardware infrastructure can currently only power to 125W/MHz, and AT&T has also agreed to further work with the Public Safety Agencies participating in the test before any increase to the maximum power level specified in the waiver of 250W/MHz or before implementing LTE in the cellular A block.

As a result, Miami-Dade County is conditionally withdrawing previous objections subject to AT&T performing a successful test in a PSD environment as described below to demonstrate to Miami-Dade County as well as other public safety entities that wish to participate that, such power limits will not increase interference to Public Safety Radio Systems.

Miami-Dade County requests that the following Technical and Operational procedures be incorporated as part of all carriers' deployment strategy:

1. Require the carriers to work with Public Safety to identify three to five sites to first get a baseline under the current power limits and compare to a test in a PSD environment to ensure that there is no increase in interference. Increased coordination will reduce interference to Public safety radio systems in Miami-Dade County.

Proposed Test Plan (Draft):

The joint team (MDC and Carrier) will select 3-5 sites that meet the following criteria:

- AT&T antennae height: < 100 Feet
- 5th and 6th UMTS carrier/LTE 10 MHz Carrier
- Same configuration in same general area

- Use Public Safety Portable Radios supplied by the PSE

Test Plan Execution

- On/off test, the PSE transmission can be heard or not heard.
- Establish baseline RF parameters (signal strength, noise floor level) and voice quality tests on the Public Safety systems at the selected area.
- Clear any existing interference issue in the selected test area.
- With AT&T functioning without interference on Public Safety, AT&T will modify the RF site parameters on Cellular B-band (UMTS-6) to emulate PSD conditions, 125 Watts/10 MHz, as previously clarified. No modifications will be made on Cellular A-band (UMTS-5) at this time.
- The Public Safety representative(s) will conduct new signal measurements and voice quality tests to determine the impact (if any) of the new PSD conditions on the Public Safety systems.
- With AT&T, Public Safety representative(s) will perform necessary tests at various distances and locations around the AT&T site.
- Re-test after LTE is installed and transmitting.



2. Participate in at least one quarterly meeting to discuss any issues, with additional meetings scheduled as needed.
3. Carriers must follow the procedure established under section 90.674 of the Commission's regulations, which requires 24 hour response to public safety requests for interference mitigation.
4. Carriers must be financially responsible to eliminate the interference to public safety that they cause in accordance with FCC 04-168 in docket WT Docket 02-55 Paragraph 128.

Please feel to contact me should have any questions concerning this update at 305-596-8098.

Sincerely,

A handwritten signature in blue ink, appearing to be "J. F. P.", written over the word "Sincerely,".

Division Director

fap@miamidade.gov

305-596-8098

Radio Communications Division

Information Technology Department

Miami-Dade County